

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

FREEDOM WATCH, INC,

Plaintiff,

v.

RESPONSE UNLIMITED, INC, et al.

Defendants.

17-cv-22777

PLAINTIFF'S MOTION FOR LEAVE TO FILE SURREPLY

Plaintiff Freedom Watch, Inc. ("Freedom Watch") hereby moves this Court for leave to file a Surreply to Defendants' Reply to Freedom Watch's Opposition to Motion to Dismiss. This motion is being made on the grounds that Defendants' Reply now contains affidavits from Joel Baugher and Philip Zodhiates that were not part of the record when Freedom Watch filed its Opposition. Moreover, these affidavits contain misstatements of fact that must be corrected. Freedom Watch requests ten days, until and including October 23, 2017 to file its Surreply. Counsel for Defendants, Mr. Cory Mauro does not consent to the relief sought. Freedom Watch is surprised that Defendants and their counsel would not consent as a matter of professional courtesy, particularly since Freedom Watch recently consented for Defendants and their counsel to an extension for them to file a Reply which contained the factually incorrect affidavits.

Dated: October 12, 2017

Respectfully submitted,

/s/ Larry Klayman

Larry Klayman, Esq.

KLAYMAN LAW GROUP, P.A.

Bar No: 246220

7050 W. Palmetto Park Rd. #15-287

Boca Raton, FL, 33433

Tel: (561)-558-5536

Email: leklayman@gmail.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically and served through the court's ECF system to all counsel of record or parties on October 12, 2017

/s/ Larry Klayman
Attorney